

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE**

ISSAC HAYES ENTERPRISES, LLC,
a Georgia Domestic Limited Liability
Company, and **ISSAC HAYES, III,** as
representative of **THE ESTATE OF
ISSAC HAYES,**

Plaintiffs,

v.

BTC, INC.,

Defendant.

CASE NO. 3:25-CV-00388

Judge Aleta A. Trauger

JOINT MOTION TO STAY PROCEEDINGS

Issac Hayes Enterprises, LLC and Issac Hayes, III as representative of the Estate of Issac Hayes (“Plaintiffs”) and BTC, Inc. (“Defendant”), pursuant to Federal Rules of Civil Procedure 6(b), 16(b)(4), and 26, jointly move this Court for an Order staying this proceeding, including Defendant’s response deadline, discovery, and all other pretrial deadlines of the Federal Rules of Civil Procedure and this Court’s Local Rules, until the United States District Court for the Northern District of Georgia has issued a final ruling in the case of *Issac Hayes Enterprises, LLC, et al. v. Donald J. Trump, et al.*, Case No. 24-cv-03639-TWT (“Original Action”). In support of this Joint Motion, the parties state as follows:

On August 16, 2024, Plaintiffs filed an action in the Northern District of Georgia against multiple parties arising out of alleged infringement of a copyrighted work. [Doc. 1]. On March 3, 2025, Defendant filed a Motion to Dismiss Plaintiffs’ Second Amended Complaint for Lack of Personal Jurisdiction and Improper Venue, or in the Alternative, to Sever the Claims Against BTC,

Inc. and Transfer Venue. [Doc. 100]. After the filing of that motion, counsel for Plaintiffs and Defendant met and conferred. Plaintiffs agreed to sever the claims asserted against Defendant and transfer them to this Court. As part of the agreement, Plaintiffs and Defendant agreed that Plaintiffs would be permitted to file a third amended complaint, and after the filing of the third amended complaint, the parties would jointly move to stay the case pending the outcome of the Original Action. On April 2, 2025, the Court in the Original Action entered an Order severing Plaintiffs' claims against Defendant and transferring them to this Court. [Doc. 132]. Plaintiffs filed their Third Amended Complaint on June 10, 2025. [Doc. 141] The Parties now jointly move to stay these proceedings, including BTC's deadline to respond to the Third Amended Complaint.

A stay of the current proceedings is necessary to promote judicial economy and avoid the risk of inconsistent rulings. The Original Action involves overlapping legal and factual issues that are central to the resolution of the current case. Allowing the Original Action to proceed to resolution will provide clarity and narrow the issues for this Court's consideration. Additionally, a stay will conserve the resources of both the Court and the Parties by avoiding duplicative litigation efforts. The Parties seek a stay of proceedings pursuant to the Court's inherent power to manage its docket and ensure the efficient use of judicial resources.

For the foregoing reasons, the Parties respectfully request that this Court grant the Joint Motion to Stay Proceedings in the above-captioned matter until the resolution of the Original Action.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2025, a true and correct copy of the foregoing was served via electronic delivery upon all parties consenting to electronic service through the Court's CM/ECF system:

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